

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

	)	
WORLDS, INC.,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	Civil Action No. 1:12-CV-10576 (DJC)
ACTIVISION BLIZZARD, INC.,	)	
BLIZZARD ENTERTAINMENT, INC. and	)	<b>*Oral Argument Requested*</b>
ACTIVISION PUBLISHING, INC.,	)	
	)	
Defendants.	)	

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT THAT THE ASSERTED  
PATENT CLAIMS ARE INVALID UNDER 35 U.S.C. § 101**

Pursuant to Fed. R. Civ. P. 56 and L.R. 56.1, Defendants Activision Blizzard, Inc., Blizzard Entertainment, Inc., and Activision Publishing, Inc. (collectively, “Defendants”) move for summary judgment that the asserted claims of U.S. Patent Nos. 7,181,690 (“the ’690 patent”), 7,493,558 (“the ’558 patent”), 7,945,856 (“the ’856 patent”), 8,082,501 (“the ’501 patent”), and 8,145,998 (“the ’998 patent”) are invalid under 35 U.S.C. § 101 as directed to patent ineligible subject matter.

In support of this motion, Defendants are filing, contemporaneously herewith: (1) Defendants' Memorandum in Support of Their Motion for Summary Judgment that the Asserted Patent Claims Are Invalid Under 35 U.S.C. § 101; (2) Defendants' Statement of Undisputed Material Facts; and (3) the Declaration of Claire M. Specht in Support of Defendants' Motion and accompanying Exhibits 1-17.

For the reasons set forth in Defendants' Memorandum in Support of Their Motion for Summary Judgment, Defendants respectfully request that the Court enter summary judgment that all asserted claims of the '690 patent, '558 patent, '856 patent, '501 patent and '998 patent are invalid.

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(d), Defendants respectfully requests oral argument on the matter to aid in resolution of the motion.

Respectfully submitted,

Date: May 19, 2020

By: /s/ Kevin S. Prussia  
Kevin S. Prussia (BBO# 666813)  
Kevin.Prussia@wilmerhale.com  
Claire M. Specht (BBO# 687952)  
Claire.Specht@wilmerhale.com  
Scott Bertulli (BBO# 690958)  
Scott.Bertulli@wilmerhale.com  
Rian Rossetti (BBO# 703878)  
Rian.Rossett@wilmerhale.com  
WILMER CUTLER PICKERING HALE AND  
DORR LLP  
60 State Street  
Boston, Massachusetts 02109  
T: (617) 526-6000  
F: (617) 526-5000

Sonal N. Mehta (*pro hac vice*)  
Sonal.Mehta@wilmerhale.com  
WILMER CUTLER PICKERING HALE AND  
DORR LLP  
950 Page Mill Road  
Palo Alto, California 94304  
T: (650) 858-6000  
F: (650) 858-6100

*Attorneys for Defendants Activision  
Blizzard, Inc., Blizzard Entertainment, Inc.,  
and Activision Publishing, Inc.*

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 7.1, I hereby certify that counsel for Defendants has conferred with Plaintiff Worlds Inc.'s counsel in an attempt in good faith to resolve or narrow the issues presented by this motion. Worlds Inc. opposes the motion.

Dated: May 19, 2020

By: /s/ Kevin S. Prussia  
Kevin S. Prussia

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) this 19th day of May, 2020.

By: /s/ Kevin S. Prussia  
Kevin S. Prussia